

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Pavel Balon

Debtor

Rushmore Loan Management
Services, LLC as servicer for U.S.
Bank National Association, not in
its individual capacity but solely as
trustee for RMTP Trust, Series 2021
Cottage-TT-V
Movant
v.

Pavel Balon
Marisol Homs - Co-Debtor
Scott F. Waterman - Trustee
Respondents

Case No.: 19-17762-amc

Chapter: 13

Judge: Ashely M. Chan

Hearing Date: March 1, 2023 at 11:00 AM

Objection Deadline: February 21, 2023

**NOTICE OF MOTION FOR RELIEF FROM
AUTOMATIC STAY AND CO-DEBTOR STAY**

Rushmore Loan Management Services, LLC as servicer for U.S. Bank National Association, not in its individual capacity but solely as trustee for RMTP Trust, Series 2021 Cottage-TT-V has filed a Motion for Relief from Stay and Co-Debtor Stay with the Court in order to gain Court authority to foreclose on real property known as 192 Maple Point Drive, Langhorne, PA 19047.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the Court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before February 21, 2023 (14 days after the date the notice was mailed) you or your attorney must do all of the following:

(a) file an answer explaining your position at

Clerk of Court
United States Bankruptcy Court
Robert N.C. Nix, Sr. Federal Courthouse

900 Market Street, Suite 400
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant's attorney:

Jason Schwartz, Esquire
Friedman Vartolo, LLP
1325 Franklin Avenue, Suite 160
Garden City, NY 11530
T: (212) 471-5100
F: (212) 471-5150
Bankruptcy@FriedmanVartolo.com

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Ashely M. Chan on the 1st day of March 2023, at 11:00 A.M., at Robert N.C. Nix Sr. Federal Courthouse, 900 Market Street, Philadelphia, PA 19107.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been canceled because no one filed an answer.

Dated: February 7, 2023
Garden City, NY

By: /s/ Jason Schwartz
Jason Schwartz, Esquire
FRIEDMAN VARTOLO LLP
Attorneys for Movant
1325 Franklin Avenue, Suite 160
Garden City, New York 11530
T: (212) 471-5100
Bankruptcy@FriedmanVartolo.com

TO:

Trustee

SCOTT F. WATERMAN [Chapter 13]
Chapter 13 Trustee
2901 St. Lawrence Ave.
Suite 100
Reading, PA 19606

Debtor's Counsel

PAUL H. YOUNG
Young, Marr, Mallis & Deane, LLC
3554 Hulmeville Rd.
Ste 102
Bensalem, PA 19020

U.S. Trustee

United States Trustee
Office of the U.S. Trustee
Robert N.C. Nix Federal Building
Suite 300
Philadelphia, PA 19107

Debtor

Pavel Balon
86 Greenridge Circle
Newtown, PA 18940

Co-Debtor

Marisol Homs
192 Maple Point Drive
Langhorne, PA 19047